

REMARKS

Claims 22 to 44 are presented for examination. Claim 22 is independent.

Favorable reconsideration and further examination are respectfully requested.

In the Examiner's Answer to the Appeal Brief filed on July 15, 2010, the Examiner stated the following:

In response Appellant states that it is not merely the crux of the argument that there is a single first element but instead that the first element diverts all voltages regardless of polarity. As explained above, the three elements above divert all polarities of voltage to the reference potential. It is true that Larson diverts the voltages in a different way than Appellant, however, the present claims do not limit the invention such that these differences overcome the rejection. It is true that in Larson, a highly positive voltage will first be shunted to VDD which then floats until it reaches 8V above the reference potential, after which it is diverted to the reference through the zener diode. There is no language in the claims stating that the voltage cannot first be diverted to another bus before being diverted to the reference. Applicant could overcome the rejection by amending the claim to state that the first element requires that the positive and negative voltages be diverted through the same path. However, as presently written, it is believed that Yrjola in view of Larson does teach all the language of claim 22.

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Accordingly, we are submitting the foregoing amendments to claim 22 to clarify that

the primary protection device [comprises] a first element that diverts all voltages having a magnitude greater than 200V along a same path to a reference potential.

¹ Examiner's Answer of October 29, 2010, page 18 (emphasis added)

In view of the foregoing statements in the Examiner's answer, we believe that the claims now overcome the outstanding rejection.

In view of the foregoing amendments and remarks, we respectfully submit that the application is in condition for allowance, and such action is respectfully requested at the Examiner's earliest convenience.

The undersigned attorney can be reached at the address shown below. All telephone calls should be directed to the undersigned at 617-521-7896.

Please apply any fees or credits due in this case, which have not already been covered by check, to Deposit Account 06-1050 referencing Attorney Docket No. 14219-079US1.

December 21, 2010
Date: _____

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Respectfully submitted,

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